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9 Attorneys for Defendant
SAMSUNG SDI MEXICO, S.A. DE C.V.

11 UNITED STATES DISTRICT COURT
12
13 NORTHERN DISTRICT OF CALIFORNIA
14
15 SAN FRANCISCO DIVISION

15 In re: CATHODE RAY TUBE (CRT)
16 ANTITRUST LITIGATION

Case No. 07-5944 SC

MDL No. 1917

17
18 This Document Relates to:

**STIPULATION AND ~~[PROPOSED]~~
ORDER REGARDING DISCOVERY TO
OCCUR AFTER SEPTEMBER 5, 2014**

19
20 *Dell Inc. and Dell Products L.P. v. Hitachi, Ltd.*,
21 No. 3:13-cv-02171-SC
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1 Defendants Samsung SDI Mexico, S.A. de C.V. ("SDI Mexico") and LG
2 Electronics, Inc. ("LGE") (together, "Defendants") and Plaintiffs Dell Inc. and Dell Products L.P.
3 ("Plaintiffs") have conferred by and through their counsel and, subject to the Court's approval,
4 HEREBY STIPULATE AS FOLLOWS:

5 WHEREAS, September 5, 2014 was the deadline to complete fact discovery in the
6 above-captioned action;

7 WHEREAS, on August 1, 2014, SDI Mexico served its First Set of Interrogatories
8 ("SDI Mexico's Interrogatories") on Plaintiffs;

9 WHEREAS, on August 1, 2014, Defendants served their First Set of Requests for
10 Admission ("Defendants' Requests for Admission") on Plaintiffs;

11 WHEREAS, on August 1, 2014, Defendants served their First Set of Requests for
12 Production of Documents ("Defendants' Document Requests") on Plaintiffs;

13 WHEREAS, on September 5, 2014, Plaintiffs served objections and responses to
14 the above-described discovery;

15 WHEREAS, Defendants and Plaintiffs have conferred in good faith and agreed that
16 Plaintiffs will serve supplemental responses to Defendants' Request for Admission Nos. 12-25,
17 35-42 and 44-80, and SDI Mexico's Interrogatory No. 20, no later than September 26, 2014;

18 WHEREAS, Defendants and Plaintiffs have conferred in good faith and agreed that
19 Plaintiffs will conduct a reasonable search and inquiry for agreements between any assigning
20 entity and any CRT product manufacturer related to purchases of CRT products during the
21 relevant period, in response to Defendants' Document Request Nos. 1 and 5; and

22 WHEREAS, Plaintiffs will inform Defendants as to the results of Plaintiffs' search,
23 but are not waiving any objections that Plaintiffs have asserted in response to Defendants'
24 Document Requests Nos. 1 and 5;

25 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED between
26 counsel for the undersigned parties as follows:

27 1. Plaintiffs will serve supplemental responses to Defendants' Requests for
28 Admission Nos. 12-25, 35-42 and 44-80, and SDI Mexico's Interrogatory No. 20, no later than

1 September 26, 2014;

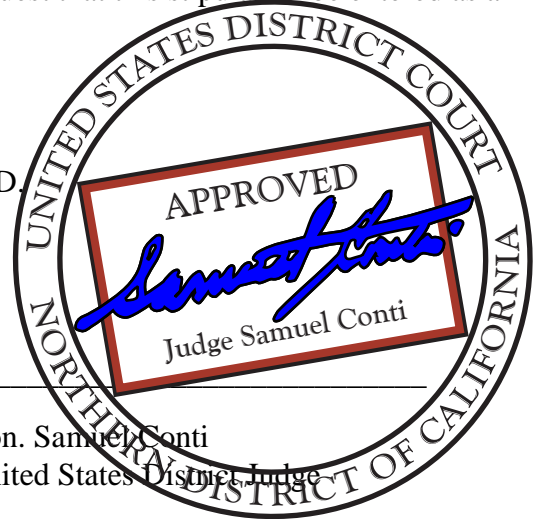
2 2. To the extent Defendants wish to file a motion to compel with respect to
3 item 1 above, or with respect to Defendants' Document Request Nos. 1 and 5, they will do so no
4 later than October 3, 2014.

5 The undersigned parties respectfully request that this stipulation be entered as an
6 Order of the Court.

7
8 PURSUANT TO STIPULATION, IT IS SO ORDERED.

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11 Dated: October 2, 2014

12
13 Hon. Samuel Conti
United States District Judge



1 Dated: September 12, 2014

By: /s/ Tyler M. Cunningham

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Pursuant to Local Rule 5-1(i), the filer attests that the concurrence in the filing of
this document has been obtained from each of the above signatories.